UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: APR 22 1993

SUBJECT: RCRA Review of Ventron/Velsicol Remedial Investigation (RI)/Feasibility Study (FS) Work Plan

FROM: Andrew Bellina, P.E.
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TO: Raymond Basso, Chief
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HWFB has reviewed the above document for compliance with RCRA standards. The 40 acre Ventron/Velsicol site operated as a chemical processing plant from 1929 until 1974. For the majority of the operating period, untreated mercury waste was discharged into an adjacent creek. Approximately 160 tons of process waste was also buried on the site. Contaminants of concern include mercury, other metals and PCBs.

1) A description of processes and waste handling operations at the site is needed to determine if any of the contaminated media contains waste which, when excavated, would be a RCRA listed waste or would be similar to a listed waste. A determination that the waste is similar to RCRA listed waste would make RCRA standards relevant and appropriate to management and remediation of the material contaminated with the listed waste. If any waste described as RCRA listed waste in 40 CFR 261 was generated and buried before, but moved after November 1980, the waste is a listed RCRA waste which would make RCRA standards applicable to management of the material. In accordance with the "Contained In Policy" contaminated media which contains RCRA listed waste can be treated to below health based levels at which point the media does not have to be managed as a RCRA hazardous waste.

2) TCLP testing should be performed on contaminated media using screening techniques to identify the most highly contaminated samples. Contaminated media exceeding RCRA toxicity characteristic levels must be managed as hazardous waste.

3) If the contaminated media is not treated to below RCRA TC levels or contains listed RCRA waste above health based limits, it is subject to RCRA Land Disposal Restrictions. It would then be necessary to comply with Best Demonstrated Available Technology (BDAT) standards listed in 40 CFR 268.43, if the soil is disposed of on the land.